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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

*(Write the District and Division, if any, of the court in which the complaint is filed.)*

Christopher Laird

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

### **-against-**

Callaway County Sheriff Department

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

## **Complaint for Violation of Civil Rights**

**(Prisoner Complaint)**

18-4043-CV-C-BCW-P  
Gage, N.Y.

### Case

*(to be filled in by the Clerk's Office)*

**REQUEST FOR TRIAL BY JURY**

Plaintiff requests trial by jury.  Yes  No

## I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Christopher Laird

All other names by which you have been known:

ID Number

Current Institution

Address

Callaway County Sheriff's Dept / Jail  
Po Box 617  
Fulton Mo 65251

### B. The Defendant(s)

- Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation
- Make sure that the defendant(s) listed below are identical to those contained in the above caption.
- For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both.
- Attach additional pages if needed.

Defendant No. 1

Name

Callaway County Sheriff's Dept / Jail

Job or Title  
(if known)

Capt Robbie Harrison

Shield Number

Employer

Callaway County Sheriff Dept / Jail

Address

Po Box 617

Fulton Mo 65251



Individual capacity



Official capacity

Defendant No. 2

Name \_\_\_\_\_

Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_

Shield Number \_\_\_\_\_

Employer \_\_\_\_\_

Address \_\_\_\_\_

Individual capacity

Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights.

What federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

Pretrial detainee  
 Civilly committed detainee  
 Immigration detainee  
 Convicted and sentenced state prisoner  
 Convicted and sentenced federal prisoner  
 Other (*explain*) \_\_\_\_\_

### IV. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

• What happened to you?  
• What injuries did you suffer?  
• Who was involved in what happened to you?  
• How were the defendants involved in what happened to you?  
• Where did the events you have described take place?  
• When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Article VI   Article VII   Article V  
See attached pages  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I suffered with constant shoulder pain, I urinated blood for a week after and now kidney pain. But also the incident gave me PTSD I have Night terrors of the defendant attacking me in my sleep cause he is the Jail Administrator so I can't sleep and they refuse to help me with the problem and hospital record from the day it happened so I have an assault and mental distress problems.

## VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

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## VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes

No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Callaway County Sheriff's Dept / Jail  
Po Box 617  
Fulton Mo 65251

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

Yes

No

Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

Yes

No

Do not know

If yes, which claim(s)?

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D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

Yes

No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes

No

E. If you did file a grievance:

1. Where did you file the grievance?

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2. What did you claim in your grievance? (*Attach a copy of your grievance, if available*)

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3. What was the result, if any? (*Attach a copy of any written response to your grievance, if available*)

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4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (*Describe all efforts to appeal to the highest level of the grievance process.*)

None There's No Alternatives to  
Grievance or remedy

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F. If you did not file a grievance:

X 1. If there are any reasons why you did not file a grievance, state them here:

because There are not any grievance  
Remedie here  
\_\_\_\_\_  
\_\_\_\_\_

X 2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

when I was assaulted by Robbie Harrison  
I informed Clay Etisam  
\_\_\_\_\_  
\_\_\_\_\_

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

\_\_\_\_\_  
\_\_\_\_\_

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*(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)*

### VIII. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this “three strikes rule”?

Yes  
No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

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A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes  
 No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (*If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.*)

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (*if federal court, name the district; if state court, name the county and State*)

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3. Docket or index number

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4. Name of Judge assigned to your case

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5. Approximate date of filing lawsuit

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6. Is the case still pending?

Yes  
 No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

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C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Yes  
 No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county and State)

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3. Docket or index number

---

4. Name of Judge assigned to your case

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5. Approximate date of filing lawsuit

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6. Is the case still pending?

Yes  
 No (If no, give the approximate date of disposition):  
\_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

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## IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: February 12, 2018.

Signature of Plaintiff

Christopher Laird

Printed Name of Plaintiff

Chris Laird

Prison Identification #

Prison Address

Galloway County Jail

City State Zip Code

Fulton Mo 65251

I was a victim of a hate crime from Robbie Harrison he came in and push me against the wall calling me a child molester he was telling me that I don't get canteen, mail, visits. Then he walks back in and puts me in handcuffs. I was being cooperative then he started lifting my arm and kneeing me in the kidney and ribs. In front of the camera I suffer with shoulder pain and rib pain and urinated blood for a week after and am still having PTSD problems, hyperventilation and night terror of the incident. This is everyone involved Robbie Harrison witness Rusty Rudd, Bill Acres, Kurt Catron, Mario Crump and officer Jake. Therefore Robbie Harrison was the one who beat me and perform the incident. The event took place at Callaway County Sheriff's Dept / jail in cell 63 in front of the camera's. The event took place on January 18 2018 between the hours of 1pm - 5pm.

Article V Right of person

being held without any proof that I Did the  
Crime and I feel I'm being held without Due  
process of law.

Article VI Further Guarantees

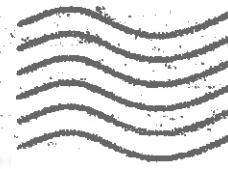
excessive Bail which my bail is \$70,000 Dollars  
and the cruel and unusual punishment of making  
me use magic shave which it's leaving Chemical  
burns on my face and only feeding us Kiddie  
TV Dinners so I'm going to bed hungry

Article VI Rights of person

enjoy the Right to a speedy and public Trial  
and to have Counsel for his Defense I've been  
here 2 month and 12 Days and have not  
seen my public Defender to discuss my case  
or anything

Chris Laird  
P.O Box 817  
Fulton Mo 65251

MID-MISSOURI P&DF  
MO 652 1 T  
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UNITED STATES DISTRICT COURT  
JEFFERSON CITY, MO  
FEB 15 2018 FILED 5:00 PM

United States District Court  
80 Lafayette Street Suite 1212  
Jefferson City Mo 65101